

**UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT**

NATIONAL LABOR RELATIONS
BOARD,

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Petitioner,

*

Case No. 18-2513

v.

*

RETRO ENVIRONMENTAL, INC.
and GREEN JOBWORKS, LLC.,

*

Respondents.

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**RESPONDENT RETRO ENVIRONMENTAL, INC.'S
ANSWER TO APPLICATION FOR ENFORCEMENT OF AN ORDER OF
THE NATIONAL LABOR RELATIONS BOARD**

Retro Environmental, Inc. ("Retro"), as a Respondent in the above-captioned case, hereby answers the Application for Enforcement filed by the National Labor Relations Board (herein "Board") with respect to its Decision and Order (herein "Order") issued on March 26, 2018 and reported at 366 NLRB No. 45, in addition to the Board's December 26, 2018, Rule 15 Notice. To each, Retro states as follows:

Retro does not contest the issue of jurisdiction regarding the Board's application pursuant to Section 10(e) of the National Labor Relations Act, as amended, 29 U.S.C. § 160(e). Retro also does not contest that venue is proper as the alleged unfair labor practices occurred in several locations, including Maryland.

As to the substance of the aforesaid Order, Retro states that it has complied with the Board's March 16, 2018, Order. Said compliance has occurred since the time this Court elected to enforce the underlying test of certification case in Case No. 18-1245.

WHEREFORE, Retro requests that the Court deny enforcement of the Order in this case as the issue is moot at this juncture. Further unnecessary judicial time and resources need not be exhausted at this point.

Respectfully submitted this 16th day of January, 2019.

/s/

Neil E. Duke

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 16, 2019, I electronically filed the foregoing document with the Clerk of the Court for the United States Court of Appeals for the Fourth Circuit by using the appellate CM/ECF system and the same was served on all parties or their counsel of record through the CM/ECF system.

/s/

Neil E. Duke